

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF TENNESSEE**  
**AT KNOXVILLE**

SNMP RESEARCH, INC. and SNMP  
RESEARCH INTERNATIONAL, INC.,

Plaintiffs,

v.

BROADCOM INC.; BROCADE  
COMMUNICATIONS SYSTEMS LLC; and  
EXTREME NETWORKS, INC.

Defendants.

Case No. 3:20-cv-00451

**DECLARATION OF ALISON PLESSMAN**

I, ALISON PLESSMAN, declare as follows:

1. I am an attorney at law duly licensed to practice before this Court. I am a partner at the law firm of Hueston Hennigan LLP, counsel of record for Defendants Broadcom Inc. (“Broadcom”) and Brocade Communications Systems LLC (“Brocade”) in this action. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. To date, Broadcom and Brocade have collectively produced over 2 million pages of highly proprietary and sensitive documents, including thousands of documents relating to their finances, and well over 20 million files of source code, object code, and build environments. Broadcom and Brocade have also responded to 216 expansive requests for production, 49 multi-part and extremely burdensome interrogatories, and 119 requests for admission. Thus, Broadcom and Brocade have gone to great lengths and expended substantial time and resources to comply with Judge Poplin’s April 22, 2022 Order and the Federal Rules of Civil Procedure.

3. Defendants’ productions have included both Broadcom and Brocade documents.

Plaintiffs' criticisms of Defendants' voluminous document productions are hypocritical as they have produced very few documents by comparison and very little of substance.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 22nd day of July 2022, at Los Angeles, California.



Alison Plessman